Case 2:06-cv-03441-WJM-MF

Document 21-2

Filed 09/26/2007

Page 1 of 11

SR-0455 STEPHEN C. RUBINO, ESQUIRE ROSS & RUBINO, LLP 8510 Ventnor Avenue Margate, NJ 08402 (609) 487-9864

Attorneys for Plaintiff, DAVID V. AMES

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

DAVID V. AMES,

Plaintiff

VS.

CORPORATION OF THE PRESIDENT OF THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah corporation sole, a/k/a the "MORMON CHURCH," and WILLIAM SCOTT HANSON, individually,

Defendants

CIVIL ACTION NO. 2:06-CV-3441

PLAINTIFF'S MOTION FOR PRO HAC VICE ADMISSION AND MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION FOR PRO HAC VICE ADMISSION

Plaintiff, David Ames, by and through his attorney of record, Stephen C. Rubino, Esq. of Ross & Rubino, LLP, pursuant to the Local Civil Rules of the United States District Court for the District of New Jersey, hereby moves for the *pro hac vice admission* of attorney Chad A. Bowers, Esq.

Dated this 26th day of September, 2007

Stephen C. Rubino, Esq.

Aft C.Ruho

Counsel for Plaintiff, David Ames

MEMORANDUM

L.Civ.R. 101.1 subsection C provides:

any member in good standing of the bar of any court of the United States or of the highest court of any state, who is not under suspension or disbarment by an court and is ineligible for admission to the bar of this Court under L.Civ.R. 101.1(b), may in the discretion of the Court, on motion be permitted to appear and participate in a particular case.

Attorney Chad A. Bowers is licensed by the state bars of Nevada and Utah and is a currently a member in good standing of both of those organizations. See Exhibit 1, Letters of Good Standing from Utah and Nevada State Bar, attached hereto and incorporated herein. Mr. Bowers has also been admitted to practice in the United States District Courts for the Districts of Utah and Nevada as well as the United States Court of Appeals for the Ninth Circuit.

Mr. Rubino hereby certifies that no disciplinary proceedings are pending against Mr. Bowers in any jurisdiction and no discipline has previously been imposed on the attorney in any jurisdiction at any time. Mr. Bowers affidavit certifying the same is attached hereto and incorporated herein as Exhibit 2 to this motion.

Mr. Rubino and Mr. Bowers understand and agree that pursuant to L.Civ.R. 101 subsections C (2), (3) and (4) that at such time that this motion may be granted Plaintiffs will submit a fee of \$150.00 to the United States District Court for the District of New Jersey and will make payment to the New Jersey Lawyers' Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a).

111

Finally, Mr. Bowers will file an appearance as counsel immediately after any order is entered granting this motion.

Dated this 26th day of September, 2007

Aft C.Ruho Stephen C. Rubino, Esq.

Counsel for Plaintiff, David Ames

EXHIBIT 1



Utah State Bar

645 South 200 East, Suite 310 · Salt Lake City, Utah 84111-3834 Telephone: 801-531-9077 Fax: 801-531-0660

September 17, 2007

To Whom It May Concern:

This is to certify that Chad A. Bowers, Utah State Bar No. 09289, was admitted to practice law in Utah on November 20, 2001 and is an active member of the Utah State Bar in good standing. "Good standing" is defined as a lawyer who is current in the payment of all Bar licensing fees, has met mandatory continuing legal education requirements, if applicable, and is not disbarred, presently on probation, suspended, or has not resigned with discipline pending, from the practice of law in this state.

No public disciplinary action involving professional misconduct has been taken against the license of Chad A. Bowers to practice law.

Katherine A. Fox General Counsel Utah State Bar

Board of Commissioners

V. Lowry Snow President Nathan Alder President-Elect Steven R. Burt, AlA Christian W. Clinger Yvette D. Diaz Mary Kay Griffin, CPA Robert L. Jeffs Curtis M. Jensen Felshaw King Lari W. Nelson Herm Olsen Stephen W. Owens Scott R. Sabey Rodney G. Snow



State Bar of Nevada

Certificate of Good Standing

IT IS HEREBY CERTIFIED that Chad A. Bowers

(Bar Number 7283) was admitted by the Supreme Court of the State of Nevada
on 09/29/2000 and is an **Active** member of the State Bar of Nevada
in good standing and is duly licensed to practice law as an Attorney and Counselor
at Law in all courts of the State of Nevada.

DATED this Friday, September 14, 2007.



Suzanne Walters

Member Services Assistant

State Bar of Nevada

6. That I understand that I have an ongoing obligation to advise the United States District Court for the District of New Jersey of any disciplinary proceedings initiated during any period of any pro hac vice admission and that I am within the disciplinary jurisdiction of this Court during any period of admission.

SUBSCRIBED AND SWORN TO before me this 25 day of September, 2007.

BRANDON WINER lotary Public, State of Nevada **EXHIBIT 2**

AFFIDAVIT IN SUPPORT OF PRO HAC VICE ADMISSION IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

Chad A. Bowers, being first duly sworn, deposes and says:

- 1. That I am an attorney duly licensed to practice law in the states of Nevada and Utah, and a member in good standing with both the Nevada State Bar and Utah State Bar.
- 2. That My business address is 3202 W. Charleston Blvd, Las Vegas, Nevada 89102, my office telephone number is (702)457-1001 and my office facsimile number is (702) 457-8006;
- 3. That I have been admitted to practice in the United States District Courts for the Districts of Utah and Nevada, and have also been admitted to practice in the United States Court of Appeals for the Ninth Circuit;
- 4. That I certify I no disciplinary proceedings are pending against me in any jurisdiction and that no discipline has previously been imposed on me in any jurisdiction.
- 5. That I understand that if I am admitted to practice in the United States District Court for the District of New Jersey in the matter of DAVID AMES v. CORPORATION OF THE PRESIDENT OF THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, I have an obligation to pay \$150.00 to the clerk of the Court of the United States District Court for the district of New Jersey and to pay such fees as may be required by New Jersey Rule 1:28-2(a) to the New Jersey Lawyers' Fund for Client Protection.

III

///

///

SR-0455 STEPHEN C. RUBINO, ESQUIRE ROSS & RUBINO, LLP 8510 Ventnor Avenue Margate, NJ 08402 (609) 487-9864

Attorneys for Plaintiff, DAVID V. AMES

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

DAVID V. AMES,

Plaintiff

vs.

CORPORATION OF THE PRESIDENT OF THE CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS, a Utah corporation sole, a/k/a the "MORMON CHURCH," and WILLIAM SCOTT HANSON, individually,

Defendants

CIVIL ACTION NO. 2:06-CV-3441

CERTIFICATE OF SERVICE

- I, Stephen C. Rubino, hereby certify under the penalties of perjury that:
- 1. I am a member in good standing of the Bar of this Court.
- 2. On September 26, 2007, I electronically filed: (1) Plaintiff's Motion for Pro Hac Vice Admission and Memorandum in Support of Plaintiff's Motion for Pro Hac Vice Admission using the CM/ECF system which will send notification of such filing to the following:

Alan E. Kraus
Latham & Watkins, LLP
One Newark Center, 16th Floor
Newark, New Jersey 07101-3174
(973) 639-1234
Attorneys for Defendant Corporation of the President of the Church of Jesus Christ of Latter-Day Saints

3. That on September 26, 2007, I sent hard copies of the above-mentioned documents via UPS to the following:

Alan E. Kraus
Latham & Watkins, LLP
One Newark Center, 16th Floor
Newark, New Jersey 07101-3174
(973) 639-1234
Attorneys for Defendant Corporation of the President of the Church of Jesus Christ of Latter-Day Saints

William Scott Hanson ADTC (1-W) 571800C Eight Production Way Avenel, New Jersey 07001

Dated: September 26, 2007

/s/ Stephen C. Rubino

Aft C. Ruho